IN THE UNITED STATES DISTRICT COURT

 FOR THE\_\_\_\_\_\_\_\_\_\_\_\_DISTRICT OF VIRGINIA

 \_\_\_\_\_\_\_\_\_\_\_ DIVISION

 \*

Plaintiff \*

 \*

vs. \* Case No.

 \*

 \*

Defendant \*

 COMPLAINT

 (Negligence - Auto Collision)

COMES NOW the plaintiff, by counsel, and in support of this Complaint states as follows:

1. The plaintiff is a citizen of the state of and resides at the address listed in the caption of this matter.

2. The defendant is a citizen of the state of and resides at the address listed in the caption of this matter.

3. This Court has subject matter jurisdiction over this matter pursuant to 28 USC 1332(a) due to the diversity of citizenship of the parties and because the amount in controversy exceeds $50,000.00 exclusive of interest and costs.

4. Venue is appropriate in this Federal district under 28 USC 1391 due to the fact that the incident in question occurred in this district.

5. This Court has personal jurisdiction over the defendant pursuant to Virginia Code 8.01-328.1 due to the fact that the defendant .

6. On 199 , a vehicle operated/occupied by the plaintiff was involved in a motor vehicle collision with the vehicle operated by the defendant at .

7. The collision was proximately caused by the negligence of the defendant.

8. The defendant was negligent in that and for such other reasons as may be adduced during discovery or at trial.

9. The collision proximately caused certain property damage to the vehicle owned by the plaintiff.

10. The incident also proximately caused certain injuries and damages to the plaintiff, including but not limited to medical and hospital expenses incurred, loss of use of the affected body parts, loss of income, and pain and suffering, some or all of which continue up to the present time and may be continuing or permanent in nature.

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendant in the amount of $ , plus an award of costs and interest.

 JURY DEMAND

The plaintiff requests trial by jury as to all issues.

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Brien A. Roche, Esq., VSB No. 16165

Johnson & Roche

8355A Greensboro Drive

McLean, Virginia 22102

*Tel.:* (703) 821-3740

*Fax:* (703) 790-9462

brienroche@aol.com

*Counsel for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

**Interrogatories and Request for Documents are served along with this Complaint**